

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**CHRISTINE MOSQUITO, as Executrix of )  
the Estate of QUINTON D. MOSQUITO, )**

**Plaintiff,** )

**Vs. ) Case Number CV-2009-103**

**PATE STEVEDORE CO., INC.;** )  
**PASCAGOULA-MOSS POINT** )  
**STEVEDORES, ILA PENSION PLAN;** )

**Defendant.** )

## JOINT MOTION TO TRANSFER

COME NOW the Plaintiff and the Defendant Pascagoula-Moss Point Stevedores, ILA Pension Plan, by and through counsel, and file this Joint Motion to Transfer, and in support thereof, would show as follows:

1. Based upon discussions between counsel for the parties, the parties have come to an agreement that this court lacks personal jurisdiction over Pascagoula-Moss Point Stevedores, ILA Pension Plan, and this claim should be transferred to the United States District Court for the Southern District of Mississippi.

WHEREFORE, the Plaintiff and the Defendant Pascagoula-Moss Point Stevedores, ILA Pension Plan pray this Honorable Court transfer this case to the United States District Court for the Southern District of Mississippi.

s/ Jason C. Johnston

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s/ Vincent J. Castigliola, Jr. (with permission)  
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